

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

TRANSTAR INDUSTRIES, LLC	)	Case No:
	)	
Plaintiff	)	<b><u>NOTICE OF REMOVAL FROM THE</u></b>
v.	)	<b><u>COURT OF COMMON PLEAS OF</u></b>
	)	<b><u>CUYAHOGA COUNTY CASE NO.</u></b>
TIM LUNDQUIST, et al.	)	<b><u>CV-20-936545</u></b>
	)	
Defendants	)	

Now come Defendants Tim Lundquist (“**Lundquist**”) and Dynotec Industries (“**Dynotec**”), by and through counsel, and hereby gives notice of removal of an action captioned *Transtar Industries, LLC v. Tim Lundquist, et al.*, Case No. CV-20-936545, filed in the Court of Common Pleas for Cuyahoga County. The grounds for removal are as follows:

1. Lundquist and Dynotec are named as defendants in *Transtar Industries, LLC v. Tim Lundquist, et al.*, Case No. CV-20-936545, pending in the Court of Common Pleas for Cuyahoga County, Ohio.
2. Lundquist is a citizen of Minnesota.
3. Dynotec is a Minnesota Corporation with its principal place of business in Jordan, Minnesota.
4. Case No. CV-20-936545 was commenced on or about August 28, 2020.
5. Lundquist and Dynotec were served with the Summons and Complaint on or about September 3, 2020.
6. Less than thirty days has passed since the service of the Summons and Complaint.

7. Plaintiff is a transmission and driveline-related solutions limited liability company with its principal place of business in Walton Hills, Cuyahoga County, Ohio. Upon information and belief, no member of Plaintiff is a citizen of Minnesota.

8. This action is removable to this Court pursuant to 28 U.S.C § 1441(a) in that this action is one over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332(a) as follows:

- a. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs;
- b. Plaintiff's members are citizens of one or more states other than the State of Minnesota while Defendants are citizens of the State of Minnesota.
- c. This petition is filed within thirty days after receipt of process as required by 28 U.S.C. § 1446(b).

9. Written notice of the filing of this Notice of Removal, together with a copy of the Notice of Removal, will be promptly given to Plaintiff and filed with the Clerk of the Court of Common Pleas for Cuyahoga County, Ohio, as required by 28 U.S.C. § 1446(d).

10. A copy of the Complaint and the Cuyahoga County Court of Common Pleas docket are attached hereto as Exhibits 1 and 2.

Respectfully submitted,

/s/ Stephen M. Bales

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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 1, 2020, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Stephen M. Bales

Stephen M. Bales (0003380)

*Counsel for Tim Lundquist & Dynotec Industries*